OF AIR AND WAR

JAN 23 2017

January 17, 2016

Ms. Jan Palumbo (AWT-150) United States EPA, Region 10 1200 Sixth Avenue, Suite 900 Seattle, WA 98101

Subject:

December 2016 Progress Report
J.H. BAXTER ARLINGTON FACILITY

Docket No. RCRA-10-2001-0086

Dear Ms. Palumbo:

This letter provides the December 2016 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from December 15, 2016, to January 14, 2017.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- > The recirculation system continued to operate without any alarms.
- ➤ The 4th quarter groundwater monitoring data was validated and the 2nd Half 2016 O&M Report is under preparation.
- ➤ The CMS revisions are under preparation based on the meeting with EPA and Battelle that occurred on December 14th, 2016.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period.
- · CMS revisions will be completed and submitted to EPA for review.
- First Quarter 2017 groundwater sampling will be performed.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

San Mateo, CA 94402 USEPA RCRA

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CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name:

Georgia Baxter

Title:

Chief Executive Officer

Date:

January 17, 2017

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely.

Georgia Baxter

Chief Executive Officer

CC:

Jeanne Tran, Ecology

Jamie Hillery, Stella-Jones Corp.

